

FILED 09 JUN '20 17:50 USDC-ORP

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:20-cr- 00184-BR

v.

INDICTMENT

NICKOLAS K. PARSONS

**18 U.S.C. § 2252A(a)(1) and (b)(1);
18 U.S.C. § 2252A(a)(5)(B) and (b)(2)**

Defendant.

Forfeiture Allegation

THE GRAND JURY CHARGES:

COUNT 1

**(Transportation of Child Pornography)
(18 U.S.C. § 2252A(a)(1) and (b)(1))**

On or about November 26, 2019, in the District of Oregon, defendant **NICKOLAS K. PARSONS** knowingly and unlawfully transported or shipped child pornography using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer;

In violation of Title 18, United States Code, Sections 2252A(a)(1) and (b)(1).

COUNT 2

**(Possession of Child Pornography)
(18 U.S.C. § 2252A(a)(5)(B) and (b)(2))**

On or about March 19, 2020, in the District of Oregon, defendant **NICKOLAS K. PARSONS** knowingly and unlawfully possessed material, containing child pornography that had

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been mailed, shipped, or transported using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that had been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, said images including a depiction of a prepubescent minor or a minor who had not attained twelve (12) years of age;

In violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

FORFEITURE ALLEGATION

Pursuant to Title 18, United States Code, Section 2253, upon conviction of an offense described above in Counts 1 or 2 of this indictment, defendant **NICKOLAS K. PARSONS** shall forfeit to the United States any and all matter which contains visual depictions of minors engaged in sexually explicit conduct that were distributed, transported, or possessed in violation thereof, and any and all property that was used or intended to be used in any manner or part to commit or to promote the commission of the aforementioned violations, including without limitation the following: one black iPhone XR.

Dated this 9th day of June 2020.

A TRUE BILL.


/ OFFICIATING FOREPERSON

Presented by:
BILLY J. WILLIAMS
United States Attorney



NATALIE K. WIGHT
Assistant United States Attorney